

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO. 3:25CR 127-MOC

MAY 22 2025

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)

BILL OF INDICTMENT

v.)

Violations: 8 U.S.C. § 1326(a)

8 U.S.C. § 1306(b)

JOSE ALBERTO VELAZQUEZ-TREJO)

18 U.S.C. § 922(g)(5)(A)

THE GRAND JURY CHARGES:

COUNT ONE

**(UNLAWFUL POSSESSION OF A FIREARM BY AN ALIEN –
18 U.S.C. § 922(g)(5)(A))**

On or about August 29, 2023, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

JOSE ALBERTO VELAZQUEZ-TREJO,

knowing that he was an alien unlawfully and illegally in the United States, did knowingly and unlawfully possess a firearm, that is, a Sig Sauer P226 handgun, in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(5)(A).

COUNT TWO

(ILLEGAL REENTRY BY AN ALIEN – 8 U.S.C. § 1326(a))

On or about August 29, 2023, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

JOSE ALBERTO VELAZQUEZ-TREJO,

an alien, was found in the United States after having been removed therefrom on or about May 19, 2008, at or near Sasabe, Arizona, and not having obtained the express consent of the Secretary of Homeland Security to reapply for admission to the United States.

In violation of Title 8, United States Code, Section 1326(a).

COUNT THREE
(FAILURE TO NOTIFY ABOUT A CHANGE OF ADDRESS – 8 U.S.C. § 1306(b))

On or about April 22, 2025, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

JOSE ALBERTO VELAZQUEZ-TREJO,

an alien, failed to give written notice to the Attorney General of a change of his address within ten days from the date of such change, as required by 8 U.S.C. § 1305.

In violation of Title 8, United States Code, Section 1306(b).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein. The Grand Jury finds probable cause that the following item is subject to forfeiture, in accordance with § 924(d), because it was involved in, used, or intended to be used in the violations alleged in this Bill of Indictment:

1. a Sig Sauer P226 handgun; and
2. ammunition seized during the investigation.

A TRUE BILL:

^

FOREPERSON

RUSS FERGUSON
UNITED STATES ATTORNEY



KENNETH M. SMITH
ASSISTANT UNITED STATES ATTORNEY